



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

August 18, 2009

Kevin D. Martin  
Forest Supervisor  
2517 S.W. Hailey Avenue  
Pendleton, Oregon 97801

**RE: U.S. Environmental Protection Agency (EPA) review and comments for the Umatilla National Forest (Forest) Farley Vegetation Management Project (Project) Record of Decision (ROD) and Final Environmental Impact Statement (FEIS). EPA Project Number: 07-059-AFS**

Dear Mr. Martin:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

We appreciate your modifications to Alternative 2. For example, we support your elimination of two harvest units with unique wildlife features such as elk wallows and your elimination of regeneration harvest units along open roads. Both of these modifications help to reduce potentially adverse impacts to wildlife. We also appreciate your selection of an alternative with no new permanent system roads. Roads and their use are the primary source of sediment to streams.

We remain concerned about your wildfire effects analysis. We believe the FEIS's conclusion on page 74, "Wildfire risk is not expected to change appreciably under any of the proposed alternatives." is inconsistent with the stated expectation in the ROD that fire danger will decrease over the longer term. Also, the statement that, "...the effect of various treatments and alternatives on fire behavior could not be reasonably assessed due to lack of adequate information on ground and ladder fuel conditions;..." (p. 74), suggests that the data needed to measure Fire Regime Condition Class (FRCC) improvements was lacking.

We recognize that expectations for decreases in fire danger and FRCC improvements are based on the Forest's extensive expertise on how silvicultural prescriptions can be used to restore historic forest conditions in the project area. However, to limit possible confusion associated with the inconsistencies listed above and enhance the effectiveness of similarly purposed silvicultural prescriptions we recommend the Forest consider long term monitoring on the effectiveness of active management in the promotion of large scale fire resilience. We are especially interested in and support the integration of results/ research on the effectiveness and environmental impacts of fuels reduction projects in Fire Regimes III and IV.

Thank you for this opportunity to comment and please contact Erik Peterson of my staff at (206) 553-6382 or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov) with any questions that you may have.

Sincerely,

/s/

Christine Reichgott, Manager  
Environmental Review and Sediment Management Unit

